

**Thomas K. Coan, OSB #89173**  
tom@tomcoan.com  
Attorney at Law  
1001 SW Fifth Ave., Suite 1400  
Portland, OR 97204  
(503) 221-8736

Attorney for Defendant Santilli

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**PETER SANTILLI,**

**Defendant.**

**Case No. 3:16-cr-00051-BR**

**MOTION FOR LEAVE TO FILE  
MOTION UNDER SEAL**

Defendant Peter Santilli, through his attorney, Thomas K. Coan, moves the court for an order allowing him to file the enclosed motion *ex-parte* and under seal because it contains confidential work product that should not be shared with the government or the other parties in this case.

Dated this 2<sup>nd</sup> day of June 2016.

Thomas K. Coan

Thomas K. Coan, OSB 89173  
Attorney for Defendant